

**PROSKAUER ROSE LLP**

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Adam T. Berkowitz (AB-0817)

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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<b>In re:</b>	: <b>Chapter 11</b>
	:
<b>LEHMAN BROTHERS HOLDINGS INC.,</b>	: <b>Case No. 08-13555 (JMP)</b>
<b><u>et al.</u>,</b>	: <b>Jointly Administered</b>
	:
<b>Debtors.</b>	:
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**VERIFIED STATEMENT OF PROSKAUER ROSE LLP  
PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2019(a)**

Proskauer Rose LLP (“Proskauer”) hereby submits this verified statement (the “Verified Statement”) pursuant to Federal Rule of Bankruptcy Procedure 2019(a), and states as follows:

1. Proskauer represents the entities listed on Exhibit A annexed hereto (collectively, the “Entities”), who may hold claims against and/or interests in the above-captioned debtors or Lehman Brothers Inc. (collectively, the “Debtors”) arising out of applicable agreements, law, or equity pursuant to their respective relationships with the Debtors.

2. The specific nature and amounts of the claims held by the Entities may be set forth in proofs of claims or other pleadings filed in the Debtors’ chapter 11 cases.

3. The following are the facts and circumstances in connection with Proskauer's employment in these cases. Each of the Entities separately approached Proskauer and requested that Proskauer represent them in connection with the Debtors' chapter 11 cases. Proskauer may also represent the Entities on matters unrelated to these cases.

4. As of the date hereof, Proskauer is not aware of any claim that it holds against the Debtors but reserves all rights to assert and file any claims that may be identified.

5. Neither this Verified Statement nor the filing of this Verified Statement shall operate as an appearance by any of the Entities, nor is this submission intended to or shall be deemed to have submitted any of the Entities to the jurisdiction of this Court.

6. The undersigned hereby verifies under oath that this Verified Statement is true and accurate, to the best of the undersigned's knowledge and belief. Proskauer reserves the right to revise and supplement this Verified Statement.

Dated: New York, New York  
October 30, 2008

Respectfully Submitted,

**PROSKAUER ROSE LLP**

By: /s/ Scott K Rutsky  
Scott K. Rutsky (SR-0712)  
Jeffrey W. Levitan (JL-6155)  
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**EXHIBIT A**

1. Markit Group Limited, Markit Valuations Limited,  
Swapswire Limited and Markit North America Inc.  
Level 5, 2 More London Riverside  
London, SE1 2AP  
United Kingdom
2. BT Americas Inc.  
350 Madison Avenue  
New York, New York 10017
3. Radianz Americas Inc.  
575 Lexington Avenue  
New York, New York 10022
4. New Meadowlands Stadium Company, LLC  
102 Route 120  
East Rutherford, NJ 07073
5. MarketAxess Holdings Inc. and MarketAxess Corporation  
140 Broadway, 42<sup>nd</sup> Floor  
New York, NY 10005
6. Depository Trust & Clearing Corporation  
55 Water Street  
New York, NY 10004
7. Sixth Gear Funding Trust and Sixth Gear Solutions Corp.  
1212 Avenue of the Americas  
17th Floor  
New York, NY 10036